

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CREEDON CONTROLS, INC., a Delaware corporation,	)	
	)	
	)	C.A. NO. 05-CV-300-JJF
Plaintiff,	)	
	)	
v.	)	
	)	
BANC ONE BUILDING CORPORATION, an Illinois corporation, and FOREST ELECTRIC CORPORATION, a New York corporation,	)	
	)	
Defendants.	)	
	)	
	)	

**NOTICE OF DEPOSITION *DUCES TECUM***

**PLEASE TAKE NOTICE** that counsel for Defendant Banc One Building Corporation will take the deposition, under oath, of **Donna Lucas**, commencing on June 23, 2006, at 9:00 a.m., and will continue thereafter from day to day until completed, at the law offices of Ashby & Geddes, 222 Delaware Avenue, 17th Floor, Wilmington, Delaware. Deponent shall produce any and all records set forth in the attached Exhibit A.

**PLEASE TAKE FURTHER NOTICE**, that the deposition will be taken before a notary public or other officer authorized to administer oaths. The deposition shall be recorded by stenographic means as well as by videotape.

Dated: June 15, 2006

**ASHBY & GEDDES, P.A.**

  
Lawrence C. Ashby (#468)  
Philip Trainer, Jr. (#2788)  
Ricardo Palacio (#3765)  
222 Delaware Avenue  
17th Floor  
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(302)-654-1888

-and-

Of Counsel:

**PAUL, HASTINGS, JANOFSKY  
& WALKER, LLP**

75 East 55th Street  
New York, New York 10022  
212-318-6000

*Attorneys for Defendant Banc One Building  
Corporation*

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**EXHIBIT A**

1. Any and all documents in your possession relating to all discussion, negotiations, correspondence, and communication with regard to the formulation of any agreement or contract between Creedon Controls, Inc. ("Creedon") and Banc One Building Corporation ("Banc One") and/or Forest Electric Corporation ("Forest Electric") related to work to be performed by Creedon at the Banc One Core Data Center in Wilmington, Delaware (the "Project").

2. Any and all documents in your possession relating to all discussion, negotiations, correspondence, and communication with regard to the formulation of any agreement or contract between Forest Electric and Banc One and/or Tishman Construction Corporation of Maryland ("Tishman") related to work to be performed, or supervised, by Forest Electric with respect to the Project.

3. Any and all documents in your possession relating to the nature and extent of the contractual obligations of Forest Electric with respect to the Project.

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